

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
SARA DEVINCENZI, as Administrator for the Estate
of BENJAMIN DEVINCENZI,

19 Civ. 6012 (VSB)

Plaintiff,

-against-

THE CITY OF NEW YORK, *et al.*,

Defendant.
----- X

**NOTICE OF MOTION TO
COMPEL DISCOVERY
AND EXTEND DISCOVERY
UNTIL AUGUST 31, 2020**

Upon the Declaration of Arthur Z. Schwartz dated July 23, 2020, and the proceedings had herein heretofore, Plaintiff shall move this Court, at a date to be determined by the Court, for an Order:

a. Pursuant to Rule 37 FRCP compelling the defendant City of New York to:

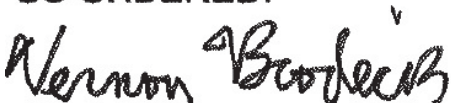
1. Comply with Rule 26 FRCP and serve Initial Disclosures;
2. Comply with Plaintiff's Request to Procure Documents;
3. Present Defendant Paule Rivera at a deposition; and

b. Extending discovery until August 31, 2020 so that the Plaintiff can complete the discovery which Defendant has refused to deliver.

Dated: July 23, 2020

On July 27, 2020, Plaintiff filed a motion to compel and to extend discovery until August 31, 2020. Since that time, discovery has been extended beyond August 31, 2020, (see Doc. 62), and the Court has issued multiple orders directing Defendants to produce certain records to Plaintiff, (see Docs. 58, 60). Plaintiff is directed to inform the Court by April 14, 2021 why this motion to compel is not moot.

SO ORDERED:



HON. VERNON S. BRODERICK 4/8/2021
UNITED STATES DISTRICT JUDGE

ADVOCATES FOR JUSTICE,
CHARTERED ATTORNEYS
Attorneys for Plaintiff

By: /s/ Arthur Z. Schwartz
225 Broadway, Suite 1902
New York, New York 10007
212-285-1400
aschwartz@afjlaw.com

TO: Amatullah Booth
Assistant Corporation Counsel
New York City Law Department
Counsel for Defendant City of New York
100 Church Street
New York, New York 10007